

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

SHERIE CLEARY, individually and on)
Behalf of others similarly situated,)
Plaintiff,)
v.)
AGORA NOTUS, LLC and RELOGIO)
LLC, *doing business as* “COMPLETE)
CASH DISCOUNT TITLE PAWN,”)
and EMPLOYMENT INNOVATIONS,)
INC. and EMPLOYMENT)
ALLIANCES, LLC, *doing business as*)
“ETOWAH EMPLOYMENT,”)
Defendants.)

) CIVIL ACTION FILE
NO. 4:19-CV-00130-LMM

JOINT MOTION TO APPROVE FLSA SETTLEMENT

Plaintiff **SHERIE CLEARY**, individually and on behalf of four (4) opt-in plaintiffs Jermicka Jackson, Rasheedah Sharif, Dominique Veal and Shonteria Hamilton (collectively the “Plaintiffs”) and Defendants **AGORA NOTUS, LLC**, **RELOGIO, LLC**, **EMPLOYMENT INNOVATIONS, INC.**, and **EMPLOYMENT ALLIANCES, LLC** (collectively the “Defendants”) (with Plaintiffs and Defendants collectively referred to as the “Parties”) who file this Motion, along with a Brief in support thereof, to respectfully move this Court to

approve the Parties' settlement agreement and enter an Order dismissing this action.

WHEREFORE, THE PARTIES JOINTLY REQUEST that:

- (a) The Settlement Agreement and Release of FLSA Claims be approved by the Court; and
- (b) The Court dismiss this action in its entirety with prejudice.

Respectfully submitted this 13th day of July 2020.

COX, BYINGTON,
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AGREED TO BY: BROWN, LLC

/s/ Jason T. Brown
(By Christopher P. Twyman w/e/p)
JASON T. BROWN
Lead Attorney for Plaintiff

AGREED TO BY:

McRAE, SMITH, PEEK,
HARMAN & MONROE, LLP

/s/John F. Lee Niedrach

(By Christopher P. Twyman w/e/p)

JOHN F. LEE NIEDRACH

*Counsel for Etowah Innovations
Inc. and Employment Alliances, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed **JOINT MOTION TO APPROVE FLSA SETTLEMENT** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following opposing counsel and all parties of interest:

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This 13th day of July 2020.

/s/ Christopher P. Twyman
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